



DLA Piper LLP (US)
One Liberty Place
1650 Market Street, Suite 5000
Philadelphia, PA 19103-7300
www.dlapiper.com

Ilana H. Eisenstein
ilana.eisenstein@us.dlapiper.com
T 215.656.3351
F 215.606.3351

Application granted. The redacted document (Doc. 38) shall remain the publicly-filed version, and the unredacted version (Doc. 36) shall remain under seal.

VIA ECF

The Honorable Philip M. Halpern
Hon. Charles L. Brieant Jr.
Federal Building and Courthouse
300 Quarropas Street, Room 530
White Plains, New York 10601

HalpernNYSDChambers@nysd.uscourts.gov

SO ORDERED.

A handwritten signature in black ink, appearing to read "Philip M. Halpern".
Philip M. Halpern
United States District Judge

Dated: White Plains, New York
March 24, 2025

Re: Regeneron Pharmaceuticals, Inc. v. Sanofi Biotechnology SAS, Sanofi S.A., Sanofi-Aventis U.S. LLC, and Genzyme Corporation, U.S.D.C., Southern District of New York – Case No. 7:24-cv-08751

Dear Judge Halpern:

We represent Defendants (“Sanofi”) and submit this Letter Motion to Seal in accordance with Federal Rule of Civil Procedure 5.2, Local ECF Rules and Instructions 6.5, and this Court’s Individual Practice Rule 5.B.

Sanofi respectfully requests that the Court seal ECF No. 36, Sanofi’s Pre-Conference Letter Motion, filed publicly on March 20, 2025. The Letter Motion included a paraphrase and an isolated quote from the License and Collaboration Agreement (“LCA”) between Sanofi and Regeneron, which the parties have agreed to keep confidential unless already public. After Sanofi’s filing, Regeneron’s counsel informed Sanofi that it considers these two brief references to the LCA confidential, and it requested that Sanofi seek leave to file the Letter Motion under seal and in redacted form.

To address Regeneron’s concerns and avoid a dispute, Sanofi contacted the ECF Help Desk via email, as directed by this Court’s ECF Rules and Instructions 21.7(a), requesting temporary sealing of ECF No. 36. Sanofi has been advised that ECF No. 36 is now temporarily sealed. Sanofi now seeks the Court’s approval to formally seal ECF No. 36. Sanofi will contemporaneously file

The Honorable Philip M. Halpern
Page 2

a redacted version, as directed by this Court's Individual Practice Rule 5.B. To the extent the Court believes a further showing must be made to justify sealing ECF No. 36, Sanofi respectfully requests that the Court direct Regeneron to provide such showing.

This motion to seal is unopposed.

Yours very truly,

/s/ Ilana H. Eisenstein
Ilana H. Eisenstein (*admitted pro hac vice*)

cc: All parties of record (via ECF)